



P.N. DALY LTD

Slavery and Human Trafficking Policy

P.N. Daly Statement

This statement sets out PN Daly's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

P. N. Daly Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

P. N. Daly Ltd is absolutely committed to preventing slavery and human trafficking in its cooperate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of P N Daly Ltd.

Undertaking of all utility activities, Gas, Electric and Water related activities.

The organisation currently operates in the United Kingdom.

The following is a process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking.

The following activities are considered to be high risk for slavery and human trafficking

- **Recruitment:**
Responsibility for the organisation's anti-slavery initiatives is as follows:
All recruitment will be monitored by our HR team and Operational Management team.
- **Policies:**
Frank Daly (Managing Director) will be responsible for all policies relating to human rights.
- **Risk Assessments:**
All recruitment will follow risk assessments on the hiring of staff. Passports and National insurance Numbers with a full address and photographic evidence will be checked at all recruitment stages.

Relevant Policies

The organisation operates the following Policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.



- Whistle Blowing policy
- Anti-Bribery and Corruption policy
- Employee Code of Conduct
- Behavioural Code
- Recruitment/Agency workers policy

Due Diligence

P N Daly undertakes due diligence when considering taking on new suppliers and regularly reviews the following;

- Evaluating the Modern Slavery and Human Trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping
- Conducting supplier Audits or assessments, which have a greater degree of focus on slavery and human trafficking.
- Creating an annual risk profile for each supplier
- Taking steps to improve sub-standard suppliers practices including providing advice to suppliers and requiring them to implement action plans
- Participating in collaborative incentives focused on human rights in general and slavery and human trafficking in particular
- Suppliers can be checked for their labour standards and compliance in general, modern slavery and human trafficking in particular, and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct including termination of the business relationship.

Training

The organisation requires all staff working in recruitment, supply chain, Managers and HR within the organisation to complete training on modern slavery (as a module within the organisations wider Human Rights/ Ethics/ Ethical Trade Training programme. The organisation's modern slavery training covers:

- Business Purchases and practices, which influence supply chain conditions and therefore should be designed to prevent purchases at unrealistic prices, the use of



- Labour engaged on unrealistically low wages or wages below National Minimum Wage, or the provision of product by an unrealistic deadline.
- How to assess the risks of slavery and human trafficking in relation to various aspects of the business including resources and support available.
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example; Modern Slavery helpline, Gang masters Licensing Authority and Stronger Together Initiative.
- What messages, Business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- What steps the organisation should take against its suppliers or contractors who do not implement anti-slavery policies in high risk scenarios, including their removal from the organisations supply chains.

Frank Daly

Managing Director PN Daly Limited

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